

DEFENDANTS' OBJECTIONS TO REGENSCHEIT FEES

LISTED PARALEGAL HOURS				
Date of service	Page # / Line #	Described service provided	Hours expended	Basis for Objection
	1/1, 5, 21	Multiple discussions of case strategy with co-counsel	0.5	Vague, excessive, unnecessary
3/23/2016	1/9	Motion to set aside order	2.5	Motion denied
8/17/2016	1/10	Send FOIA request to IPRA	0.3	Documents never produced in discovery by Plaintiff; FOIA request rather than subpoena
8/24/2016	1/14	Review FOIA response from IPRA	0.3	Documents never produced in discovery by Plaintiff; FOIA request rather than a subpoena
	1/15, 16, 18	Court appearances	1.5	Not yet licensed as attorney; co-counsel billed for these appearances
10/27/2016 and 11/1/2016	2/2, 3	Multiple meetings with co-counsel to discuss case strategy	1.3	Vague, excessive, unnecessary
		Disputed hours	6.4	
LISTED ATTORNEY HOURS				
	1/1, 3, 13, 20	Review of transcripts and responses	1.9	Vague, excessive, unnecessary
	1/ 4, 5, 7, 10, 15, 17	Multiple meetings with co-counsel to discuss case strategy	5	Vague, excessive, unnecessary
	1/11, 12, 16, 19	Compile hours, update charts, draft letters, conduct research	3.3	Clerical / administrative; should be billed at paralegal rate
11/22/2016	1/14	Court appearance	2.6	Duplicative hours; billed by co-counsel
11/23/2016	1/18	Review FOIA information; telephone conference with LAPD	0.5	Discovery violation – materials never produced in discovery; FOIA instead of subpoena
	2/ 1, 2, 6, 7, 18, 31	Transcribe OEMC audio, draft letters, telephone calls, review docket, draft subpoena	3.7	Clerical / administrative; should be billed at paralegal rate

	2/ 3	Fax documents to LAPD	0.2	Discovery violation – materials never produced in discovery
	2/4, 8, 11, 15, 22, 30	Multiple meetings with co-counsel discussing case strategy	1.0	Vague, excessive, unnecessary
	2/21	Review and compare transcript	1.1	Duplicative; excessive time for task
	3/ 1, 2, 4, 12, 13, 20, 22, 24, 28, 29, 30	Telephone calls, draft letters, draft subpoenas, serve subpoenas	2.6	Clerical / Administrative; should be billed at paralegal rate
	3/ 3, 5, 6	Review transcripts, review status report, review OEMC audio	1.3	Vague, duplicative of other billing entries; excessive time for task performed
	3/ 9, 11, 14, 17, 18, 19, 23, 27	Multiple meetings and discussions with co-counsel	2.2	Excessive, vague, unnecessary
2/22/2017	3/ 10	Court appearance	1.2	Duplicative; co-counsel billed for this court appearance
	4/ 1 – 6, 8, 12, 14, 33	Telephone calls, review exhibits, draft letters	3.1	Clerical / administrative; should be billed at paralegal rate
	4/7, 10, 13, 15, 18 – 24, 27, 29	Multiple reviews of deposition transcripts, OEMC audio	10.6	Vague, excessive, duplicative
	4/ 9, 25, 26, 28, 30, 32,	Multiple discussions and meetings with co-counsel	2.1	Vague, excessive, unnecessary
4/25/2017	4/25/2017	Court appearance	0.9	Duplicative; co-counsel billed for this court appearance
	5/ 1, 2, 3, 8, 11, 12, 19	Draft letters, telephone calls, edit transcript, request records	4.1	Clerical / administrative; should be billed at paralegal rate
	5/ 4, 5, 6, 7, 9, 13, 16, 26, 27, 28, 31, 32	Multiple meetings and discussions with co-counsel	3.9	Vague, excessive, unnecessary
	5/ 10, 17, 18	Review of documents and transcripts	2.6	Vague, excessive
	6/1, 11, 20, 21, 27,	Review of various documents	4.3	Vague, excessive

	6/2, 4, 7, 8, 10, 17, 26, 29, 32, 34, 35, 36	Multiple conversations and meetings with co-counsel	4	Vague, excessive, unnecessary
	6/ 3, 5, 12, 22, 23, 24, 25, 30, 31	Draft emails, telephone calls, draft notice of deposition	2.0	Clerical / administrative; should be billed at paralegal rate
6/13/2017	6/13, 14	Court appearance	4.7	Duplicative; co-counsel billed for this court appearance
7/13/2017	6/33	Create Google maps	2.6	Duplicative – multiple billing entries for making maps
	6/28	Deposition of Jill Maderak	1.4	Duplicative – deposition taken by co-counsel
	7/1, 6, 8, 9, 10, 17, 20, 21, 22, 23, 24, 29	Multiple meetings / discussions / conversations with co-counsel	8.8	Vague, excessive, unnecessary
	7 / 3, 4	Email to Alex Zeier regarding courtroom technology; create Google maps	1.4	Duplicative of entries by co-counsel
	7/5, 15, 27	Review of records, documents, transcripts	1.2	Duplicative, vague
8/8/2017; 8/17/2017	7/7, 27	Court appearances	7.2	Duplicative as co-counsel billed for these court appearance
	7/11, 12, 13, 26, 28	Telephone calls, draft letters, draft subpoenas, edit transcripts	3.6	Clerical / administrative; should be billed at paralegal rate
	8/2, 12, 21, 23, 28,	Telephone calls, edit transcripts, draft letters	1.0	Clerical / administrative; should be billed at paralegal rate
	8/3, 4, 11, 17, 25, 26,	Review of documents, legal research, review of court orders	5.0	Duplicative, excessive, vague
	8/5, 7, 16, 22, 24, 31	Multiple conversations / meetings / discussions with co-counsel	2.5	Vague, excessive, unnecessary
9/1/2017	8/9, 10	Court appearance	3.0	Duplicative as co-counsel billed for same court appearance

	8/29, 32, 33, 34, 35	Work related to financial depositions of defendant officers	4.9	Unnecessary litigation as plaintiffs did not pursue punitive damages at trial; traded costs for punitive damages
10/18/2017	9/14	Court appearance	1.1	Duplicative as co-counsel billed for same court appearance
10/27/2017	9/18	Court appearance	1.1	Duplicative as co-counsel billed for same court appearance
11/21/2017	9/32	Court appearance	1.0	Duplicative as co-counsel billed for same court appearance
11/30/2017	9/33	Court appearance	0.9	Duplicative as co-counsel billed for same court appearance
	9/1 -5, 7-10, 12-13, 15	Work related to financial affidavits and depositions of defendant officers	5.6	Unnecessary litigation as plaintiffs did not pursue punitive damages at trial; traded costs for punitive damages
	9/6, 17, 20, 29	Review of documents, transcripts, rulings, records	1.6	Vague, duplicative, unnecessary
	9/11, 21, 22, 34, 35	Telephone calls, draft letters, review documents	2.2	Clerical / administrative; should be billed at paralegal rate
	9/16, 19, 23, 27, 31,	Multiple conversations regarding case strategy with co-counsel	1.1	Vague, excessive, unnecessary
1/10/2018	10/12	Court appearance	0.8	Duplicative as co-counsel billed for the same court appearance
12/1/2017	10/1	Review letter received from anonymous witness regarding defendant Valentin	0.3	Vague; document never produced or disclosed in discovery
	10/2, 4, 5	Multiple discussions and communications with co-counsel	0.3	Vague, excessive, unnecessary
	10/3, 6, 7, 8, 9	Draft letters, telephone calls, office meetings	1.9	Clerical / administrative; should be billed at paralegal rate
		Disputed hours	101.7	
		Hours that should be billed at paralegal rate	27.5	